



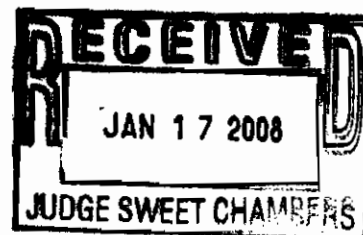
THE CITY OF NEW YORK  
LAW DEPARTMENT

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January 17, 2008



**Via Facsimile (212) 805-7925**

Honorable Robert W. Sweet  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Clifton Thomas v. City of New York et al.  
1:07-cv-11425-RWS

Your Honor:

I am the Assistant Corporation Counsel in the Office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendant City. Plaintiff has filed the above-referenced complaint, wherein he alleges, *inter alia*, that on March 8, 2007, he was falsely arrested and detained by New York City police officers. Plaintiff further asserts a claim for malicious prosecution. Defendant City respectfully requests an extension of the time to answer or otherwise respond to the complaint from its current due date of January 9, 2008 to March 10, 2008. Plaintiff's attorney, Wale Mosaku, Esq., has consented to our request.

Defendant has several reasons for seeking an enlargement of time. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, the City requires additional time to investigate plaintiff's allegations. With respect to the false arrest and malicious prosecution charges, it is our understanding that records pertaining to the underlying criminal action, including police records, may have been sealed pursuant to New York Criminal Procedure Law § 160.50.

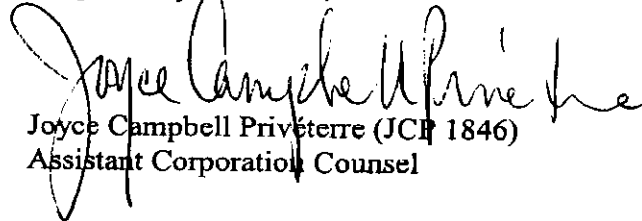
Additionally, plaintiff alleges that he sustained psychological injuries. Therefore, this office is in the process of forwarding to plaintiff for execution a consent and authorization for the release of pertinent sealed records, as well as medical authorizations to obtain records pertaining to plaintiff's purported injuries. The enlargement of time will enable the City to properly assess the case and respond to the complaint.

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*1.18.08*

No previous request for an enlargement of time has been made. Accordingly, we respectfully request that defendant City's time to answer or otherwise respond to the complaint be extended from January 9, 2008 to March 10, 2008.

Thank you for your consideration in this matter.

Respectfully submitted,



Joyce Campbell Priveterre (JCP 1846)  
Assistant Corporation Counsel

cc: **Via Facsimile (718) 243-9148**

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